

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 461 & 1245

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS ORDER
(I) AUTHORIZING THE DEBTORS TO (A) REJECT CERTAIN UNEXPIRED LEASES
EFFECTIVE AS OF NOVEMBER 25, 2024 AND (B) ABANDON CERTAIN PERSONAL
PROPERTY AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On October 9, 2024, the Court entered an *Order (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Authorizing and Establishing Procedures to Reject Executory Contracts and Unexpired Leases* (D.I. 461) (the “**Lease Rejection Procedures Order**”).

2. Pursuant to the Lease Rejection Procedures Order, on November 25, 2024, the Debtors filed the *Sixth Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases (and the Abandonment of Property)* (D.I. 1245) (the “**Sixth Rejection Notice**”). Attached to the Sixth Rejection Notice was a proposed form of order approving the Sixth Rejection Notice

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

and authorizing the Debtors to reject certain executory contracts and/or unexpired leases effective as of November 25, 2024 (the “**Proposed Order**”).

3. The deadline to object to each of the Sixth Rejection Notice was December 9, 2024, at 4:00 p.m. (ET). Before the objection deadline, Unca International LLC filed an objection to the proposed rejection of its contract [D.I. 1320]. The Debtors received no other objections to the Sixth Rejection Notice. The Debtors have removed its contract with Unca International LLC from the proposed list of rejected contracts, without prejudice, while the Debtors work to consensually resolve the objection.

4. Attached hereto as **Exhibit A** is the Proposed Order with a revised schedule of rejected contracts. Attached hereto as **Exhibit B** is a redline marking the changes against the schedule filed with the initial Sixth Rejection Notice.

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WHEREFORE, the Debtors respectfully request that the Court enter the order attached hereto as **Exhibit A** at its earliest convenience.

Dated: January 13, 2025
Wilmington, Delaware

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